

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

AUTHORS GUILD, DAVID BALDACCI, MARY BLY, MICHAEL CONNELLY, SYLVIA DAY, JONATHAN FRANZEN, JOHN GRISHAM, ELIN HILDERBRAND, CHRISTINA BAKER KLINE, MAYA SHANBHAG LANG, VICTOR LAVALLE, GEORGE R.R. MARTIN, JODI PICOULT, DOUGLAS PRESTON, ROXANA ROBINSON, GEORGE SAUNDERS, SCOTT TUROW, and RACHEL VAIL, individually and on behalf of others similarly situated,

Plaintiffs,

v.

OPENAI INC., OPENAI LP, OPENAI LLC, OPENAI GP LLC, OPENAI OPCO LLC, OPENAI GLOBAL LLC, OAI CORPORATION LLC, OPENAI HOLDINGS LLC, OPENAI STARTUP FUND I LP, OPENAI STARTUP FUND GP I LLC, and OPENAI STARTUP FUND MANAGEMENT LLC,

Defendants.

No. 1:23-cv-08292-SHS-OTW

JONATHAN ALTER, KAI BIRD, TAYLOR BRANCH, RICH COHEN, EUGENE LINDEN, DANIEL OKRENT, JULIAN SANCTON, HAMPTON SIDES, STACY SCHIFF, JAMES SHAPIRO, JIA TOLENTINO, and SIMON WINCHESTER, on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

OPENAI, INC., OPENAI GP, LLC, OPENAI, LLC, OPENAI OPCO LLC, OPENAI GLOBAL LCC, OAI CORPORATION, LLC, OPENAI HOLDINGS, LLC, and MICROSOFT CORPORATION,

Defendants.

No. 1:23-cv-10211-SHS-OTW

NICHOLAS A. BASBANES and NICHOLAS NGAGOYEANS (professionally known as Nicholas Gage), individually and on behalf of all others similarly situated,

Plaintiffs,

v.

MICROSOFT CORPORATION, OPENAI, INC., OPENAI GP, LLC, OPENAI HOLDINGS, LLC, OAI CORPORATION, LLC, OPENAI GLOBAL, LLC, OPENAI, LLC, and OPENAI OPCO LLC,

Defendants.

No. 1:24-cv-00084-SHS-OTW

**MOTION TO WITHDRAW VERA RANIERI AS COUNSEL FOR DEFENDANTS
OPENAI, INC., OPENAI GP, LLC, OPENAI HOLDINGS, LLC, OAI
CORPORATION, LLC, OPENAI GLOBAL, LLC, OPENAI, LLC, AND OPENAI
OPCO LLC**

PLEASE TAKE NOTICE THAT, Morrison & Foerster LLP hereby moves this court for an order pursuant to Local Civil Rule 1.4, relieving Vera Ranieri, as counsel for Defendants OPENAI INC., OPENAI LP, OPENAI LLC, OPENAI GP LLC, OPENAI OPCO LLC, OPENAI GLOBAL LLC, OAI CORPORATION LLC, OPENAI HOLDINGS LLC, OPENAI STARTUP FUND I LP, OPENAI STARTUP FUND GP I LLC, and OPENAI STARTUP FUND MANAGEMENT LLC in the above captioned action on the grounds that she is no longer an attorney with Morrison & Foerster LLP, and respectfully requests that she be removed from the CM/ECF noticing list and any other service list in this case.

PLEASE TAKE FURTHER NOTICE the undersigned counsel from Morrison & Foerster LLP will continue to represent Defendants OPENAI INC., OPENAI LP, OPENAI LLC,

OPENAI GP LLC, OPENAI OPCO LLC, OPENAI GLOBAL LLC, OAI CORPORATION LLC, OPENAI HOLDINGS LLC, OPENAI STARTUP FUND I LP, OPENAI STARTUP FUND GP I LLC, and OPENAI STARTUP FUND MANAGEMENT LLC.

Dated: January 7, 2025

MORRISON & FOERSTER LLP

By: /s/ Joseph C. Gratz

Joseph C. Gratz (*pro hac vice*)

JGratz@mofo.com

Tiffany Cheung (*pro hac vice*)

TCheung@mofo.com

Andrew L. Perito (*pro hac vice*)

APerito@mofo.com

425 Market Street

San Francisco, CA 94105-2482

Telephone: (415) 268-7000

Facsimile: (415) 268-7522

Rose S. Lee (*pro hac vice*)

RoseLee@mofo.com

MORRISON & FOERSTER LLP

707 Wilshire Boulevard

Los Angeles, California 90017-3543

Telephone: (213) 892-5200

Facsimile: (213) 892-5454

Attorneys for Defendants

OPENAI INC., OPENAI LP, OPENAI LLC, OPENAI GP LLC, OPENAI OPCO LLC, OPENAI GLOBAL LLC, OAI CORPORATION LLC, OPENAI HOLDINGS LLC, OPENAI STARTUP FUND I LP, OPENAI STARTUP FUND GP I LLC, and OPENAI STARTUP FUND MANAGEMENT LLC